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Attorneys for Defendant

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

TERESA FREED,)	Case No. C 06 2300 MJJ
Plaintiff,)	
v.)	STIPULATION AND PROPOSED
UNITED STATES OF AMERICA,)	ORDER EXTENDING DEADLINES AND
Defendant.)	ADR SELECTION

The parties to the above-entitled action, through their attorneys of record, hereby
 STIPULATE AND REQUEST as follows.

The parties to this action participated in a Case Management Conference on March 20,
 2007, during which counsel and the Court discussed and agreed to extend certain deadlines by
 six weeks, in order to afford AUSA James A. Scharf, who recently associated into this case as an
 additional attorney for defendant, the opportunity to conduct needed discovery. Accordingly, the
 parties jointly request the following changes to the case schedule.

Event	Current Date	Proposed Date
Fact Discovery Cut-Off:	5/25/07	7/6/07
Parties to Name Experts by:	6/1/07	7/13/07
Expert Reports to be Tendered by:	6/8/07	7/20/07
Design. of Suppl. and Reb. Experts:	6/22/07	8/3/07

Suppl. and Reb. Expert Reports Due:6/22/07

8/3/07

Expert Discovery Cut-Off

7/6/07

8/17/07

In addition, the parties jointly request that they be permitted to participate in a private mediation with either Kevin Kelly or Charlie Hawkins to occur on or about August 1, 2007, in lieu of the August 1, 2007, Settlement Conference before Magistrate Judge Elizabeth D. Laporte.

All other deadlines will remain in effect, including but not limited to the 9/11/07 Pre-Trial Conference, and the 9/24/07 Trial.

Respectfully submitted,

DATED: March 28, 2007

SCOTT N. SCHOOLS
United States Attorney

/s/

JAMES A. SCHARF
Assistant United States Attorney
Attorney for Defendant

SCOTT N. SCHOOLS
United States Attorney

/s/

DATED: March 28, 2007

ABRAHAM A. SIMMONS
Co-counsel for Defendant

DATED: April 4, 2007

THE ARNS LAW FIRM

/s/

ROBERT S. ARNS
Attorney for Plaintiff

1 DATED: March 28, 2007

LAW OFFICES OF LINDA M.
SCAPAROTTI


2 /s/

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4 Linda M. Scaparotti
Co-counsel for Plaintiff

5 ~~PROPOSED~~ ORDER

6 Upon stipulation of the parties and good cause appearing to extend certain deadlines as
7 set forth above and to allow the parties to engage in a private mediation in lieu of the August 1,
8 2007, settlement conference, IT IS SO ORDERED.

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10 Dated: 4/9/2007


11 MARTIN J. JENKINS
12 United States District Judge
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